

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

JANE DOE #1, on behalf of herself and all	)	
others similarly situated,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION NO:
v.	)	7:21-cv-00220-RDP
	)	
MG FREESITES, LTD, d/b/a “PORNHUB”;	)	Honorable Chief Judge R. David Proctor
MG FREESITES II LTD; MINDGEEK	)	
S.A.R.L.; MINDGEEK USA	)	
INCORPORATED; MG CY HOLDINGS LTD;	)	
MINDGEEK CONTENT RT LIMITED; 9219-1	)	
QUEBEC, INC., d/b/a MINDGEEK; MG BILL	)	
LTD,	)	
	)	
Defendants.	)	
	)	

**JOINT REQUEST FOR STATUS CONFERENCE**

Given that the Honorable Chief Judge R. David Proctor was recently assigned this case, Plaintiff Jane Doe (“Plaintiff”) and Defendants MG Billing LTD, MG CY Holdings LTD, MG Freesites II LTD, MG Freesites LTD, Mindgeek Content RT Limited, Mindgeek S.A.R.L., and Mindgeek USA Incorporated (collectively “Defendants”) together (the “Parties”) respectfully requests this Court set a status conference.

The Court issued a Revised Scheduling Order on January 10, 2023, which set the trial in this case for “[f]ive months after the dispositive motion deadline to be held in Tuscaloosa, Alabama.” Doc. 66 at 3. During an August 15, 2024 telephone conference, the Court extended the dispositive motion deadline to September 6, 2024, which would set the Trial deadline for February 6, 2025. However, the Honorable Judge L. Scott Coogler informed the parties

sometime in 2024 that he planned on retiring at the end of that year, and that he would no longer be able to preside over the trial. The Court issued its Order Denying Cross Motions for Summary Judgment on December 19, 2024, and this case was reassigned to Your Honor on January 15, 2025. That same day Defendants moved to decertify the class and for certification for interlocutory appeal. Docs. 266 and 267. Plaintiff's responses to both of these motions were filed on February 5, 2025, and Defendants' replies are due February 19, 2025. Doc. 268.

Given that the governing scheduling order is no longer feasible, the Parties respectfully request this Court schedule a status conference to discuss setting the case for trial. Plaintiff requests the status conference be held as early as the Court's docket permits, but Defendants request that any status conference be scheduled for a date after February 19, 2025, so as to allow the Court to consider whether it desires to also order oral arguments on the Defendants' pending motions be heard at the status conference.

Date: February 7, 2025

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**CERTIFICATE OF SERVICE**

I hereby certify on this 7th day of February 2025, this document was served on all counsel of record.

/s/ Gregory Zarzaur

Gregory Zarzaur